

Kris Sperry, M.D.  
Forensic Pathologist

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Certified by the American Board of Pathology in:  
Anatomic Pathology  
Clinical Pathology  
Forensic Pathology

July 25, 2007

Dear Ms. Ferrari:

At your request, I have reviewed materials you provided me concerning the death of Allen Keith Whitfield. These include very extensive records and documents as provided by Louisiana-Pacific Corporation (among which are witness statements and investigative information about the incident), medical records of Mr. Whitfield from the North State Medical Center, the Person County EMS report, the Person County Memorial Hospital E. R. records from 11/14/05, the Report of the Investigation By Medical Examiner, and the depositions of Wayne Young, Mark Carter, and Cameron Vaughan. I have relied upon the information contained within these documents as the basis upon which to form my opinion.

On November 14, 2005, at or around approximately 0945 to 0950 hours, Keith Whitfield was engaged in welding activities in and around a waferizer machine, which incorporated conveyor belts, and became caught in a conveyor belt that suddenly activated. He was dragged in to the machine mechanism, feet first and supine. The subsequent examination of his body by the medical examiner revealed an estimated height of 5 feet, 6 inches (66 inches). He could not be rescued from the conveyor and the machine until he had been pulled completely in to the machine, and was deceased.

The medical examiner's evaluation of Mr. Whitfield's body revealed closed fractures of the left lower leg (tibia and fibula) and the right femur (thigh), trauma and crepitance of the right posterior chest (described by the emergency room physician as "flail chest"), complete separation of the left shoulder from the body, a scalping injury of the head, and an identifiable skull fracture. With a conveyor speed of approximately 100 feet per minute to 200 feet per minute, it would have taken approximately two to four seconds for his body to have passed entirely into the mechanism which caused the severe crushing injuries of his entire body. As he passed in to the mechanism feet first, his head would have passed in to the mechanism between a minimum of 1 to 2 and up to 3 to 4 seconds later; until then, he would have been conscious and able to perceive the pain associated with the severe crushing injuries that were ascending up his body. Once his head entered the mechanism, he would have most probably lost consciousness, given the injuries as were documented that involved his head. Although he most certainly sustained severe crushing internal chest and abdominal injuries, these would not have rendered him unconscious, nor unable to perceive what was happening to him or unable to experience the intense pain associated with the crushing injuries.

Based upon the foregoing, it is my opinion, to a reasonable degree of medical certainty, that Allen Keith Whitfield died of massive crushing injuries, and that based

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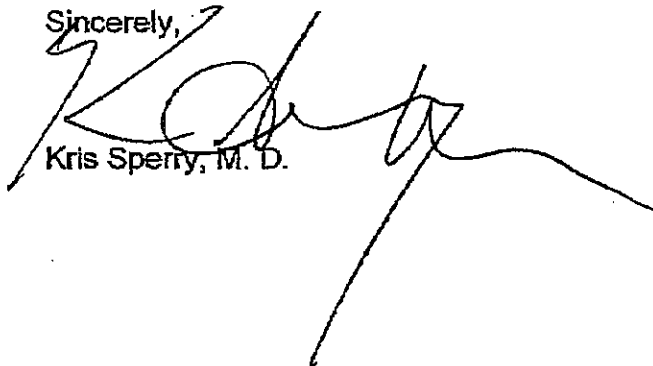
upon a minimum conveyor speed of approximately 100 feet per minute, he would have been conscious and experiencing conscious pain and suffering for a period of approximately 3 to 4 seconds from the time his feet entered the mechanism. If the conveyor speed were 200 feet per minute, he would have been conscious and able to experience pain and suffering for approximately 1 to 2 seconds.

All of the foregoing is rendered to a reasonable degree of medical certainty.

I charge \$400 per hour for consulting and review of materials, \$1500 for up to two hours of deposition testimony and \$750 per hour for any hour or portion or an hour thereafter, and \$4500 per day plus applicable travel and lodging expenses for appearing live at court.

My Curriculum Vitae and a list of cases in which I have testified over the previous 5 years are submitted separately.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kris Sperry', with a long, sweeping horizontal line extending to the right.

Kris Sperry, M. D.

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